

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:	:	
	:	25-md-3143 (SHS) (OTW)
OPENAI, INC., COPYRIGHT	:	
INFRINGEMENT LITIGATION	:	Hon. Sidney H. Stein
-----	:	Hon. Ona T. Wang
	:	
THIS DOCUMENTS RELATES TO:	:	
	:	
All Actions.	:	
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	X	

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brian M. Kramer hereby moves this Court for an Order for admission to practice *pro hac vice* and to appear as counsel for OpenAI Inc.; OpenAI LLC; OpenAI LP; OAI Corporation LLC; OpenAI GP LLC; OpenAI Global LLC; OpenAI Holdings LLC; OpenAI OpCo LLC; OpenAI Startup Fund GP I LLC; OpenAI Startup Fund I LP; OpenAI Startup Fund Management LLC (“OpenAI”), in the above-captioned actions.

I am in good standing of the bar of the State of California, and a certificate of good standing for that jurisdiction is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony and have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Dated: May 6, 2025

MORRISON & FOERSTER LLP

By: /s/ Brian M. Kramer

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